

ATTACHMENT # A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
MAR 01 2019
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

Jim T. Glover Sr.)
Plaintiff,)
v.)
Corporal Boardman)
Correctional officer IRION)
Defendant.)

CASE NO.
MAGISTRATE JUDGE
WILLIAM H. BAUGHMAN, JR.
POSITION STATEMENT REGARDING
AGENDA FOR CASE MANAGEMENT
CONFERENCE

Jim T. Glover Sr. Plaintiff/ Boardman/IRION Defendant [party's name]

pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16.3(b)(3), hereby submits the following statement of its position regarding the agenda for the Case Management Conference to be held on _____:

1. This case should be assigned to the following track:

☒ Expedited _____ Standard _____ Administrative
_____ Complex _____ Mass Tort

2. This case _____ is/ _____ is not suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms:

_____ Early Neutral Evaluation _____ Summary Jury Trial
_____ Mediation _____ Summary Bench Trial
_____ Arbitration

3. The parties do do/ _____ do not consent to the jurisdiction of the United States Magistrate Judge under 28 U.S.C. § 636(c).

4. **Non-Expert Discovery** shall be completed on or before 4-1-19.
Discovery shall be conducted according to the guidelines set forth in Local Rule 16.2(a) for cases assigned to the case management track referred to in item no. 1 above. The Court specifically directs the parties to comply with Local Rule 37.1, including the obligation to contact the presiding judicial officer by telephone, before filing any motion under Federal Rule of Civil Procedure 37 seeking aid from the Court in discovery matters.

5. **Expert reports** must be submitted to opposing counsel on or before 4-1-19,
for the party bearing the burden of proof on the issue addressed. Responsive reports are due by 4-16-19. **Expert Discovery** shall be completed on or before 4-1-19.

6. **Filing of Discovery Materials.** Unless otherwise ordered by the Court, initial disclosures, discovery depositions, interrogatories, requests for documents, requests for admissions, and answers and responses thereto shall **not** be filed in the Electronic Case Filing System, except that discovery materials may be filed as evidence in support of a motion or for use at trial.

7. The **pleadings shall be amended** and **new parties shall be joined** on or before _____.

8. **Dispositive motions** shall be filed on or before 4-2-19. Motions for summary judgment may be filed at any time authorized under Rule 56, F.R.C.P., but the filing of such motions prior to the completion of discovery relevant to issues raised is discouraged. The requirements of Rule 56, including those under Rules 56(e) and (f), will be strictly applied.

Jim T. Glover Jr.
COUNSEL FOR PLAINTIFF(S)/DEFENDANT(S)

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JIM T GLOVER Jr.	;	CASE NO. 1:18 CV 1134
Plaintiff	;	Judge: Donald C. NUGENT
v.	;	MAGISTRATE Judge
Corporal Boardman	;	William H. BAUGHMAN Jr.
Corr. officer IRION	;	Position Statement, Regarding
defendants	;	AGENDA for Case Management Conference

Now comes the PLAINTIFF Jim T. Glover Jr./Corporal Boardman, Corr. officer IRION/Defendants. Pursant to federal Rules of civil procudure 26(f) and local Rule 16.3 (b) (3), hereby Submits the following statement of its Position regarding the agenda for the Case Management Conference to be held on 4-20-19. The AGenda of the Plaintiff consist of the discovery materials set forth inside this statement. Plaintiff testifies under sworn statement, that defendants violated his consitutional Rights. Defendants subjected the Plaintiff to CRUEL and Unusaul Punishment. While he was an detainee at the Cuyahoga County Correctional Center, (CCCC)/county Jail Defendants unlawfully demonstrated lethal amounts of force, which consisted of assault. The following items of discovery shall be completed on or before 4-1-19. The Plaintiff is Requesting the court to Subpena the body camera's of Corporal Boardman and Correctional Officer IRION and c/o Christy. Thrid officer involved but not defendant, was present at assault. The defendant is Request the honorable court to Subpena the Doctor and nurse Sick-call list of January - may of 2018. The requested discovery is proving

Fact. That, The Plaintiff was refused medical attention for his wounds and afflictions. The defendant stated in thier answer that the Plaintiff diñt complain about his affliction. This statement is an absolute lie. That can be proven as an fictitious statment with the discovery item the Plaintiff request. The Expert Reports must be Submitted before or on 4-1-19. The expert report the Plaintiff request are the Original Insitutional Informal Complaint, that the Plaintiff filed with the Sheriff's Office. The Plaintiff Request the Phone ~~xxx~~ records of the county jail on or about march-may of 2018. The Plaintiff's phone call to the P.R.E.A. Hotline, concerning the nature of the assault, where Plaintiff anus, and testicles were sprayed with pepper spray. The Plaintiff also Request to Subpena wittnesses for ~~xxxx~~ trial, Subpena Corporal Lazata - Marcus Harris former director of nursing of Cuyaboga county jail - Gary Brack former interim director of ambulatory care at the Cuyaboga County Jail. - Officer Christy of County Jail c/o. - Intutional Inspector Hudson. The Plaintiff is willing to have Settlement conference to Expedite the case along if the defendant's seem suitable. OR Proceed to Jury trail as Plaintiff demanded in Original Complaint

Sincerely Submitted
Jim T Glover Jr.